

REMARKS/ARGUMENTS

Applicant has received the Office Action dated August 7, 2007 (hereinafter "Current Office Action"), in which the Examiner continued to reject claims 1-36 as being allegedly anticipated by Rothermel et al. (U.S. Pat. No. 6,678,827, hereinafter "Rothermel"). With this Response, Applicant has amended claims 1, 18, 22 and 31. Based upon the amendments and arguments contained herein, Applicant believes this case is in condition for allowance.

I. THE ROTHERMEL REFERENCE

Applicant respectfully submits that the Rothermel reference, cited by the Examiner as allegedly anticipating all the claims of the subject application, teaches allowing "the manager device to create a consistent security policy for the multiple NSDs by distributing a copy of a security policy template to each of the NSDs and by then configuring each copy of the template with NSD-specific information." Rothermel, col. 3, lines 32-36. This ordering of first sending the template to the NSD and then configuring the template at the NSD with device specific information is consistently repeated throughout the reference, both in the specification and the claims. See Rothermel, col. 4, lines 32-38 ("...[the] system allows a security policy manager device to create a consistent security policy for multiple network security devices (NSDs) by distributing a copy of a security policy template to each of the NSDs and by then configuring each copy of the template with NSD-specific information.") (emphasis added); col. 4, lines 65-67 through col. 5, lines 1-4 ("...the manager device can distribute the template to multiple NSDs by sending a single copy of the template to a supervisor device associated with the NSDs and by then having the supervisor device update each of the NSDs with a copy of the template. Each of the NSD template copies can then be configured with NSD-specific information...") (emphasis added); and col. 7, lines 20-26 ("The primary supervisor devices then send a copy of the security policy template to each of the selected NSDs. Each NSD stores its copy of the security policy template with the NSD's specific security information. Each NSD's copy of the security policy template can then be configured with information

specific to the NSD.”) (emphasis added). *See also* Rothermel, claims 4, 6, 14, 34 and 45.

Applicant further respectfully notes that the Examiner has acknowledged, in response to Applicant's prior arguments, that “Rothermel does indeed teach such local expansion where a network security device (henceforth NSD) receives a template and then expands it by the addition of NSD specific information....” Current Office Action, ¶ 3, p. 3. The Examiner further alleges, however, that “the Rothermel patent also teaches expansion of a template at a central location with later distribution of the expanded information to a plurality of computing devices.” Current Office Action, ¶ 3, p. 3. The Examiner cited col. 10, line 8 through col. 11 line 17 of Rothermel in support of the allegation, stating that,

...Rothermel teaches the use of a graphical user interface by an administrator to establish a security policy (e.g. Alias lists) in a template with subsequent distribution of the template to a plurality of computing devices (NSD's). Such establishment of security policies for a network in a template does read on the applicant's claim limitation of 'expansion' of a template as further developed in the arguments presented July 25, 2007 where the Applicant states that expansion of a template at a central location comprises using those templates at the centralized location.

Current Office Action, ¶ 3, p. 3. Applicant respectfully traverses the Examiner's characterization of the cited art, noting that the cited portion of Rothermel teaches “graphical user interface screens such as may be provided by a manager device to assist in defining security policy templates” (emphasis added). Thus Rothermel teaches operating a user interface to create a security policy template, not to establish security policies using the template as alleged by the Examiner. Contrary to the Examiner's assertion, Rothermel teaches creating individual security policies by combining a common security policy template with individual network profiles. As shown in figure 3A of Rothermel, “In order to generate the specific security policy for each network, the security policy template is combined with the network profile for that network. For example, in order to create security policy 315 for network 1, the security policy template 300 is combined with

network profile 310 for network 1.” Rothermel, col. 10, lines 18-23. Applicant thus respectfully submits that the Examiner has conflated the creation of the security policy template (via the described graphical user interface) with the use of the template to create a security policy for a specific network. Applicant further notes that the combination of the security policy template with each network profile (as shown in figure 3A) is described in the Rothermel specification in abstract terms. No mention is made anywhere within the description of figure 3A of what elements of the system perform the combination, nor of any type of transfer of the template, network policies, or resulting security policies between any of the system elements. All other descriptions of such combinations and transfers within the Rothermel reference teach first transferring and/or copying the security template to the NSDs, and then combining NSD-specific information with the transferred and/or copied template at each NSD.

For at least the reasons described above, Applicant thus respectfully submits that neither the text cited by the Examiner, or any other portion of the Rothermel reference, supports the Examiner’s allegation that Rothermel teaches a template that is expanded at a central location and subsequently distributed to a plurality of computing devices.

II. THE REJECTIONS OF INDEPENDENT CLAIMS 1, 8, 22 AND 31

The Examiner rejected independent claim 1 as allegedly anticipated by Rothermel, stating, among other things, that “Rothermel teaches... expanding at least one template at a central location, and providing the expanded information to said plurality of computing devices (col.4, line 49 thru col.5 line 13).” Office Action mailed January 30, 2006 (hereinafter “Prior Office Action”), ¶ 5, p. 3 (incorporated by reference into the Current Office Action, ¶ 6, p. 4). Without conceding the merits of the Examiner’s rejection, Applicant has amended independent claim 1 to more clearly describe the claimed invention, and to expedite prosecution of the subject application. Applicant respectfully again notes that the Examiner has acknowledged that the cited text from Rothermel of the Prior Office Action teaches “such local expansion where a network security

device (henceforth NSD) receives a template and then expands it by the addition of NSD specific information.” Current Office Action, ¶ 3 p. 3.

Applicant further notes that Rothermel does not teach or even suggest “expanding at least one template at a central location to create a document comprising expanded information,” as required by amended independent claim 1. Rothermel also does not teach or even suggest subsequently providing the created document from the central location to the plurality of computing devices, also as required by amended independent claim 1. Although Rothermel teaches combining NSD-specific information with a copy of a security template that has been copied to the NSD, Rothermel is silent as to the format and/or form of the resulting combination. Further, as already noted, Rothermel only teaches performing the combination of the template and the NSD-specific information at the NSD. Thus, regardless of the form of the product of the combination taught by Rothermel, said product already resides on the NSD upon its creation at the NSD, and is not transferred to the NSD from a central location.

For at least all the reasons described above, Applicant respectfully submits that the Rothermel reference fails to teach or even suggest all of the limitations of independent claim 1, as amended. Applicant thus respectfully submits that amended independent claim 1, as well as those claims that depend upon it, are not anticipated by Rothermel under 35 U.S.C. 102(b), and all of these claims are therefore in condition for allowance.

Regarding independent claim 8, Applicant respectfully notes that the Examiner rejected the claim for substantially the same reasons as claim 1, citing the same portion of the Rothermel reference. Independent claim 8 requires, among other things, “a plurality of agents which are respectively resident on each of said plurality of computing devices,” as well as a communications gateway that is configured to “expand the retrieved templates to create respective documents containing combined template information and expanded information,” and to “provide the documents containing the combined template

information and expanded information to said plurality of agents.” As already submitted, Rothermel does not teach or even suggest creating such documents, nor providing the documents to either a plurality of computing devices, nor to agents residing on such computing devices. Thus, for at least the same reasons as those presented with regard to independent claim 1, Applicant respectfully submits that independent claim 8, as well as those claims that depend upon it, are all in condition for allowance.

Regarding independent claims 22 and 31, and without conceding the merits of the Examiner’s rejections of the claims, Applicant has amended the claims to clearly describe the claimed invention and to expedite prosecution of the subject application. Applicant notes that claims 22 and 31, as amended, include limitations similar to those of independent claims 1 and 8. Thus, for at least the same reasons as those provided regarding claims 1 and 8, Applicant respectfully submits that amended independent claims 22 and 31, as well as those claims that respectively depend upon them, are all in condition for allowance.

III. THE REJECTIONS OF DEPENDENT CLAIMS 15, 19, 23, 28-29 AND 32

Applicant respectfully submits that at least some of the dependent claims of the subject application are allowable for other reasons in addition to those described above. Specifically, dependent claims 15, 19, 23 and 32 each require that the document required by their respective independent claim be an extensible markup language (XML) document. In the Current Office Action, the Examiner maintains that passages from Rothermel cited in the Prior Office (col. 5 lines 5-7) teach this claim element. Applicant respectfully notes that the cited passage is an incomplete sentence that does not seem to be relevant to the claim limitation “wherein said document is an XML document.” Specifically, the paragraph that includes the cited passage reads,

In order to remotely manage multiple NSDs, a manager device can use one or more intermediate supervisor devices. For example, after a security policy template is defined, the manager device can distribute the template to multiple NSDs by sending a single copy of the template to a supervisor device associated with the NSDs and by then having the supervisor device update each of the NSDs with a

copy of the template. Each of the NSD template copies can then be configured with NSD-specific information from one or more of a variety of sources, such as by the manager device, by a local user such as a system administrator, or automatically such as with DNS information. In particular, aliases in the template copy on a particular NSD can be replaced with information about the specific corresponding devices that are protected by the NSD, and NSD-specific access information can also be specified. For example, an alias for an HTTP server can be replaced with the specific network address and name of the actual HTTP server.

Rothermel, col. 4, lines 63-67 through col. 5, lines 1-13 (emphasis added to show the passage cited by the examiner). Nowhere with the cited passage is an XML document even mentioned. Further, as already noted, Rothermel does not teach or even suggest the creation of a document of any kind, and does not teach, mention or even suggest an XML document anywhere within the reference. Applicant thus respectfully submit that for at least these reasons, and in addition to the reasons previously presented, dependent claims 15, 19, 23 and 32 are not anticipated by Rothermel, and are thus all in condition for allowance.

Regarding dependent claims 28 and 29, Applicant respectfully notes that, in the Prior Office Action, Applicant had submitted that these claims required multiple templates, some of which inherit policies from each other. Applicant respectfully notes that the Examiner has failed to address these arguments. Applicant continues to respectfully assert that for at least this reason, and in addition to those reasons given with regard to independent claim 22, upon which claims 28 and 29 depend, dependent claims 28 and 29 are in condition for allowance. Applicant respectfully requests that the Examiner either respond to the arguments or allow the claims.

IV. ADDITIONAL AMENDMENTS

Applicant respectfully notes that dependent claim 18 has been amended to maintain consistency with the amendments made to independent claim 1, upon which claim 18 depends. The amendment does not alter the scope of the claim.

V. CONCLUSION

Applicant respectfully submits that for at least the reasons presented above, all claims are in condition for allowance. Applicant respectfully requests reconsideration and that a timely Notice of Allowance be issued in this case. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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